

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES  
OF AMERICA

V.

ROBERT KNOWLES,  
Defendant,

CRIMINAL NO. 04-30019-MAP

DISCLOSURE OF 3500 MATERIALS

Now comes the defendant in the above-entitled indictment and requests this Honorable Court order the government to disclose 3500 materials for all witnesses, government or defense called law enforcement witnesses at Motions to Suppress as well as trial.

The grounds are set forth with greater particularity in the accompanying memorandum.

Respectfully submitted,

THE DEFENDANT

By:

  
ALAN J. BLACK, His Attorney  
Morton and Black  
1383 Main Street  
Springfield, MA 01103  
(413) 732-5381  
BBO# 553768

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MEMO IN SUPPORT OF DISCLOSURE OF 3500 MATERIALS

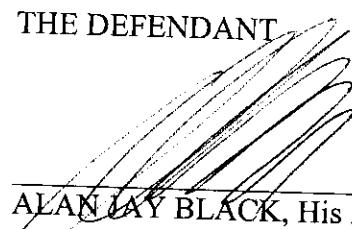
Fed.R.Crim.P., 12(i) provides for disclosure of 3500 materials for government witnesses or defense called Law Enforcement witness at Motion to Suppress hearings.

Defendant may file suppression motions relating to illegally seized tangible evidence, statements and/or identification. He will require disclosure of 3500 materials in order to effectively prosecute the Motion to Suppress and to defend himself at trial. See, Jencks Act. 128 USC 3500.

Respectfully submitted,

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